



**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

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March 19, 2012

TO: Supervisor Zev Yaroslavsky, Chairman
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: Wendy L. Watanabe
Auditor-Controller

A handwritten signature in blue ink, reading "Wendy L. Watanabe", is written over the printed name and title.

SUBJECT: **HUMAN SERVICES CONSORTIUM OF THE EAST SAN GABRIEL VALLEY dba LA WORKS – A COMMUNITY AND SENIOR SERVICES' WORKFORCE INVESTMENT ACT PROGRAM CONTRACT SERVICE PROVIDER – CONTRACT COMPLIANCE REVIEW – FISCAL YEARS 2009-10 AND 2010-11**

We completed a review of Human Services Consortium of the East San Gabriel Valley, dba LA Works (LA Works or Agency), a Community and Senior Services' (CSS) Workforce Investment Act (WIA) Program provider. Our review covered a sample of transactions from Fiscal Years (FY) 2009-10 and 2010-11. The purpose of our review was to determine whether LA Works provided services in compliance with their County contracts and WIA requirements.

The WIA Adult and Dislocated Worker Programs assist individuals in obtaining employment, retaining their jobs, and increasing their earnings. The WIA Youth Program is a comprehensive training and employment program for in-school and out-of-school youth. The WIA American Recovery and Reinvestment Act Programs supplement the WIA Programs.

CSS paid LA Works approximately \$3.8 million on a cost-reimbursement basis for FY 2010-11. LA Works serves participants residing in the First, Fourth, and Fifth Supervisorial Districts.

Results of Review

LA Works provided required services to eligible participants, and maintained sufficient internal controls over its business operations. However, LA Works billed CSS \$76,970 in questioned costs, and did not always comply with all WIA requirements. Specifically, LA Works:

- Billed \$73,045 for unallowable University of New Mexico College Prep Program (UNM CPP) expenditures. We noted similar findings in our prior two years' monitoring reviews of the Agency.

After our review, LA Works repaid CSS the \$73,045 in questioned costs. However, the Agency's attached response indicates that they believe the UNM CPP expenditures should be allowable because they were procured properly, and were necessary and reasonable. However, the State of California Employment Development Department (EDD) has questioned the allowability of the UNM CPP expenditures. As a result, CSS informed the Agency that, beginning in April 2008, expenditures for UNM CPP would be disallowed until a final determination by the EDD. To date, EDD has not made a final determination, and CSS is continuing to disallow UNM CPP expenditures.

- Billed \$3,925 for expenditures that were not supported by the Agency's accounting records.

After our review, LA Works repaid CSS the \$3,925 in questioned costs.

- Did not accurately report the participants' activities/information on the Job Training Automation (JTA) System as required by WIA Directive LACOD-WIAD08-38 for five (14%) of the 35 participants reviewed.

After our review, LA Works updated the JTA System to accurately reflect the five participants' activities/information.

Details of our review, along with recommendations for corrective action, are attached.

Review of Report

We discussed our report with LA Works and CSS. In their attached response, LA Works agreed with our findings and recommendations, except for the UNM CPP expenditures. However, LA Works repaid the \$76,970 in questioned costs, which included the UNM CPP expenditures. CSS management indicated that they will resolve any disputed findings in accordance with their Resolution Procedures Directive.

We thank LA Works for their cooperation and assistance during our review. Please call me if you have any questions, or your staff may call Don Chadwick at (213) 253-0301.

WLW:JLS:DC:EB:ku

Attachment

c: William T Fujioka, Chief Executive Officer
Cynthia D. Banks, Director, Community and Senior Services
Salvador Velasquez, Chief Executive Officer, LA Works
Kevin Stapleton, Chairman, LA Works
Public Information Office
Audit Committee

**HUMAN SERVICES CONSORTIUM OF THE EAST SAN GABRIEL VALLEY dba
LA WORKS
WORKFORCE INVESTMENT ACT PROGRAMS
CONTRACT COMPLIANCE REVIEW
FISCAL YEARS 2009-10 AND 2010-11**

ELIGIBILITY

Objective

Determine whether Human Services Consortium of the East San Gabriel Valley, dba LA Works (LA Works or Agency) provided services to eligible individuals for the Workforce Investment Act (WIA) and American Recovery and Reinvestment Act Programs.

Verification

We reviewed the case files for 35 (6%) of 557 participants, who received services from July 2010 through May 2011, for documentation to confirm their eligibility for WIA services.

Results

LA Works maintained documentation to support the eligibility of the 35 participants reviewed.

Recommendation

None.

BILLED SERVICES

Objective

Determine whether the Agency provided services in accordance with the County contracts and WIA guidelines.

Verification

We reviewed the case files of 35 (6%) participants who received services from July 2010 through May 2011.

Results**Youth Programs**

LA Works did not accurately report the participants' activities, such as exits from the Program, on the Job Training Automation (JTA) System as required by WIA Directive LACOD-WIAD08-38 for three (30%) of the ten participants reviewed. The State of California Employment Development Department and the United States Department of Labor use the JTA System to track WIA participant activities. After our review, LA Works updated the JTA System to accurately reflect the three participants' activities.

Adult and Dislocated Worker Programs

LA Works did not accurately report the participants' information, such as the social security number and exit from the Program, on the JTA System for two (8%) of the 25 participants reviewed. After our review, LA Works updated the JTA System to accurately reflect the two participants' information.

Recommendation

1. LA Works management ensure staff update the Job Training Automation System to accurately reflect participant activities and information.

CASH/REVENUE**Objective**

Determine whether the Agency deposited cash receipts timely, and recorded revenue in the Agency's records properly.

Verification

We interviewed Agency personnel, and reviewed the Agency's financial records. We also reviewed the Agency's bank activity for March and April 2011.

Results

LA Works deposited cash timely, and recorded revenue properly.

Recommendation

None.

COST ALLOCATION PLAN**Objective**

Determine whether LA Works' Cost Allocation Plan was prepared in compliance with the County contracts, and used to allocate shared expenditures appropriately.

Verification

We reviewed the Agency's Cost Allocation Plan, and a sample of shared expenditures for November 2010 to March 2011, to ensure that the expenditures were allocated to the Agency's WIA Programs appropriately.

Results

LA Works' Cost Allocation Plan was prepared in compliance with the County contracts, and costs were allocated appropriately.

Recommendation

None.

EXPENDITURES**Objective**

Determine whether expenditures charged to the WIA Programs were allowable under the County contracts, documented properly, and billed accurately.

Verification

We interviewed Agency personnel, and reviewed financial records and documentation for 25 non-payroll expenditure transactions, totaling \$219,579, billed by the Agency from November 2010 to March 2011.

Results

LA Works billed Community and Senior Services (CSS) \$73,045 for unallowable expenditures related to the University of New Mexico College Prep Program (UNM CPP). In April 2008, May 2008, and May 2009, CSS notified LA Works that expenditures related to the UNM CPP would be disallowed. We noted similar findings in our prior two years' monitoring reviews of the Agency.

In addition, \$1,432 of the \$73,045 billed was for a participant who was not enrolled on the JTA System. After our review, LA Works repaid CSS the \$73,045 in questioned costs, and enrolled the participant on the JTA System.

Recommendations**LA Works management:**

2. Discontinue billing CSS for the University of New Mexico College Prep Program and all related expenditures.
3. Ensure that expenditures billed are allowable and for costs incurred by the WIA Program.

ADMINISTRATIVE CONTROLS/CONTRACT COMPLIANCE**Objective**

Determine whether the Agency had adequate internal controls over its business operations. In addition, determine whether the Agency was in compliance with Program and administrative requirements.

Verification

We interviewed Agency personnel, reviewed their policies and procedures manuals, conducted an on-site visit, and tested expenditure, payroll, and personnel transactions.

Results

LA Works maintained sufficient internal controls over its business operations and complied with other Program and administrative requirements. However, LA Works did not conduct a price analysis for a vehicle lease, as required by WIA Directive D-DWA-00-037.

Recommendation

4. LA Works management ensure that staff comply with required procurement policies.

PAYROLL AND PERSONNEL**Objective**

Determine whether payroll expenditures were charged to the WIA Programs appropriately. In addition, determine whether the Agency obtained background clearances, verified employability, maintained proof of current driver licenses, and maintained proof of automobile insurance for new employees assigned to the WIA Programs.

Verification

We traced the WIA payroll expenditures for five employees and five participants, totaling \$25,030, for March 2011, to the Agency's payroll records and time reports. We also reviewed the personnel files for two new employees assigned to the WIA Programs.

Results

LA Works charged payroll expenditures to the WIA Programs appropriately, and maintained personnel files as required.

Recommendation

None.

CLOSE-OUT REVIEW**Objective**

Determine whether the Agency's Fiscal Year (FY) 2009-10 final close-out invoices for the WIA and Governor's Economic Stimulus Dislocated Worker Programs reconciled to the Agency's accounting records.

Verification

We traced LA Works' final close-out invoices for FY 2009-10 to the Agency's accounting records.

Results

LA Works' accounting records did not support \$3,925 billed for tuition and participant fringe benefits. After our review, LA Works repaid CSS the \$3,925 in questioned costs.

Recommendation

5. LA Works management ensure the final close-out invoices reconcile to the accounting records.



Salvador R. Velasquez
Chief Executive Officer

March 5, 2012

Wendy L. Watanabe, Auditor-Controller
Department of Auditor-Controller
Countywide Contract Monitoring Division
350 S. Figueroa Street, 8th Floor
Los Angeles, CA 90071
Attention: Katherine Urbanski

Dear Ms Watanabe:

Re: FEBRUARY 28, 2012 MONITORING REPORT OF THE AUDITOR
CONTROLLER 2010-11 WORKFORCE INVESTMENT ACT PROGRAM.

BILLED SERVICES

Recommendation

- LA Works management ensures staff updates the Job Training Automation System to accurately reflect participant information and activities.

Response

Agreed.

EXPENDITURES

Recommendation

- LA Works management discontinues billing CSS for the University of New Mexico College Prep Program and all related expenditures.
- Ensure that expenditures billed are allowable and for costs incurred by the WIA Program.

Response:

See attached letter addressing this issue.

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Salvador R. Velasquez
Chief Executive Officer

ADMINISTRATIVE CONTROLS/CONTRACT COMPLIANCE

Recommendation

- LA Works management ensure that staff complies with required procurement policies.

Response:

Agreed

CLOSE-OUT REVIEW

Recommendation


- LA Works management ensure the final close-out invoices reconcile to the accounting records.

Response:

Agreed

If you have any questions, please let me know. I can be reached at richard.jewik@laworks.org or at 626-960-3964 x2230.

Sincerely,


Salvador R. Velasquez
Chief Executive Officer

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March 5, 2012

Honorable Members of the Board of Supervisors
Supervisor Zev Yaroslavsky, Chairman
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Don Knabe
Supervisor Michael D. Antonovich
Kenneth Hahn Hall of Administration
County of Los Angeles
500 West Temple Street
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Salvador R. Velazquez
Chief Executive Officer

Board of Directors

Kevin Stapleton
Chairman

Shelley Sanderson

Gene Murabito

Winston Lee

Joe Rocha

Bill Wise

**RE: FEBRUARY 28, 2012 MONITORING REPORT OF THE
AUDITOR-CONTROLLER CONDUCTED FOR THE 2010-11
WORKFORCE INVESTMENT ACT PROGRAM**

Honorable Chairman and Members of the Board:

You have received a report from the Auditor-Controller's Office reflecting its review of the performance of your contractors for job-training services throughout the County. That report reflects the good work that LA Works does for the people of the East San Gabriel Valley, but also reports on a current dialog under way among LA Works, the Los Angeles County Community and Senior Services (CSS), and the State Employment Development Department (EDD). We wanted to provide a bit more information so your Board has a better understanding of the issues under discussion. 3200

LA Works is a joint powers agency of the Cities of Azusa, Covina, Glendora, and West Covina. We are a community service and workforce investment partnership founded in 1976 as the primary public job training and placement center for residents of the East San Gabriel Valley and we are proud of our long and collaborative relationship with the County. LA Works is a Workforce Investment Act (WIA) provider for CSS. lowindale Avenue Suite 210 lowindale

The Auditor-Controller's finding relates to our very successful College Works Program. This unique program prepares low-income high school students for college. LA Works collaborates with the University of New Mexico to give high school students the chance to spend two weeks on a college campus, living, learning, and working with successful role models in an inspiring environment. Out-of-state travel is an eye-opening experience for these young people. Although high school graduation rates and college attendance are terribly low for many of the schools in the communities we serve, those who participate in College Works have had tremendous success: 99% graduate from high school and 78% go on to attend college! These young men and women are well on their way to a degree of success in life not available to most of their peers and we are proud to contribute to their accomplishments. CA 91706 Phone 626.969.3964 Fax 626.962.0064 www.laworks.org



The Los Angeles County Auditor-Controller recently conducted a contract compliance review of LA Works for fiscal year 2010-11 pursuant to its WIA oversight role. In its draft report, the Auditor-Controller concluded that the costs associated with the College Works Program were unallowable because they were not properly procured and were not necessary and reasonable. The report implies that College Works is inappropriately billed to CSS and fails to comply with applicable regulations. The report recommends that LA Works discontinue billing CSS for the College Works Program. LA Works disagrees with the Auditor-Controller's conclusion and is doing everything in its power to ensure that the program continues. Indeed, CSS disagrees as well, both because our procurement was pursuant to CSS' direction and because CSS is presently appealing EDD's tentative conclusions on these issues.

The Auditor-Controller's conclusion that College Works' costs are unallowable is not supported by the facts or the governing regulations for the reasons noted in two attached reports by Edward J. Donahue, Jr. and John G. Chamberlain. Both are nationally recognized WIA experts. As Mr. Donahue's analysis notes, LA Works conducted a full, competitive-procurement, RFP process for College Works that was consistent with federal, state, and county procurement policies and procedures. Mr. Chamberlain reaches a similar conclusion and opines that College Works costs incurred from 2004 to 2011 were reasonable relative to market rates and necessary to achieve valid program goals. As LA Works has maintained, the program was properly procured and the costs are both necessary and reasonable. The Auditor-Controller's report does not argue otherwise and simply starts with a contrary assumption because EDD has not yet been persuaded to resolve its tentative findings on these points. But for all the reasons noted in the attached reports, EDD is wrong, as is the terse discussion in the Auditor-Controller's report.

In addition, LA Works repaid the County the questioned costs in full with the understanding that CSS will reimburse those funds when EDD's concerns are resolved. We are grateful that the audit report notes that the questioned costs were repaid but are disappointed that it contains the negative finding and recommends LA Works cease billing CSS for College Works. We find this curious given that these issues have been in discussion for several years and the Auditor-Controller has never previously found it necessary to report these not-yet-concluded discussions to your Board.

The dispute with CSS stems from a larger dispute between CSS and the State Employment Development Department (EDD). The EDD requested additional information about the College Works Program as part of its monitoring review of CSS. EDD questioned costs associated with the program. This in turn caused CSS to question those costs.

Despite the fact that the EDD's review and appeal process is ongoing, and despite the fact that LA Works has had no ability to participate in those appeals (because it is not directly funded by EDD), the Auditor-Controller's report recommends we discontinue

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College Works. As a result, the community is in danger of losing a valuable program. The College Works Program targets at-risk, economically disadvantaged, WIA-eligible students in their junior year at high schools with dropout rates approaching 50%. Despite their challenging circumstances, 99% of program participants complete high school. Seventy-eight percent have been admitted to and attended college. This success is due in large part to the University of New Mexico's participation. An analysis prepared by Edward DeJesus, the third attachment to this letter, explains why College Works has been so successful. I urge you to read it. Sadly, the Auditor-Controller's report threatens to eliminate this successful program.

In conclusion, an excellent program has unfairly been singled out, perhaps driven by a misconception that the University of New Mexico was chosen for frivolous reasons or at the expense of a California institution, neither of which is the case. As mentioned in the attached reports, none of the many California colleges and universities that received our RFP submitted a proposal. This likely reflects the different financial incentives of California's cash-strapped college systems as compared to UNM. Unfortunately, it is LA Works participants who suffer from the ongoing dispute.

However, I remain hopeful that a favorable resolution will be reached. Since there is no WIA prohibition on interstate travel (as might be expected from a federally funded program), I believe strongly that the College Works Program will ultimately be vindicated and the costs allowed by EDD. In the meantime, I simply want to make sure that Board of Supervisors understands the benefits of the program. I hope that when others question College Works or the County's support for LA Works, you will be able to tell them the rest of the story.

Thank you for your consideration of this information and for the County's partnership with LA Works in improving the lives of the people who make up our communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Salvador R. Velasquez', is written over a horizontal line.

Salvador R. Velasquez
Chief Executive Officer

Enclosures (3)

c: William T. Fujioka, Chief Executive Officer
Cynthia D. Banks, Director, Community and Senior Services
Kevin Stapleton, Board Chairman, LA Works
Wendy L. Watanabe, Auditor-Controller

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Edward J. Donahue, Jr.
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I, Edward J. Donahue, Jr., am the retired Chief of the Division of Policy, Review and Resolution within the Office of Grants and Contracts Management of the U.S. Department of Labor (DOL), Employment and Training Administration (ETA). In this capacity, I was responsible for the development of the regulatory provisions included at 20 CFR Part 667 – the Administrative Provisions under Title I of the Workforce Investment Act, and had considerable input into a number of the other regulatory provisions for the Act. In addition, I was responsible for the development, issuance of and training provided on the “Comprehensive One-Stop Financial Management Technical Assistance Guide” which was issued as final in August 2002. I was responsible for the development of and training on all financial and grants management policies and procedures for all programs funded by the Employment and Training Administration. I also served as the DOL representative on the government-wide Federal Chief Financial Officers’ Grants Policy Committee. In my capacity as Division Chief, I was also the ETA Grant Officer responsible for all Audit Resolution and Closeout of ETA grants and contracts.

At the request of the Human Resources Consortium of the East San Gabriel Valley, doing business as LA Works, I have reviewed the propriety of its 2004 and 2008 selection of the University of New Mexico to be the operator of its College Works program. A finding in a State of California, Employment Development Department (EDD) review report dated May 22, 2008, which addresses its monitoring of the Los Angeles County Department of Community and Senior Services (LADCSS) recommends that LADCSS provide EDD with documentation demonstrating that the College Works program was properly procured by all participating subrecipients. LADCSS, a department of a county government, and LA Works, a consortium of a number of local jurisdictions, are both governmental entities.

The Workforce Investment Act (WIA) regulations at 20 CFR 667.200(a)(1) requires that government organizations that receive funds under WIA Title I must follow the uniform administrative requirements codified at 29 CFR part 97. The provision at 20 CFR 97.36(b)(1) indicates that grantees and subgrantees are to use their own procurement procedures so long as they reflect applicable State and local laws and regulations, provided that they conform to Federal law and procurement standards.

Based on the language included its 2004 and 2008 Request for Proposals (RFP) and its awards to LA Works for both years, LADCSS required no additional procurement actions by LA Works for the award of any WIA funding to an organization with which it had entered into a Memorandum of Understanding (MOU) as a mandatory partner to its Youth Collaborative. In its proposals for both 2004 and 2008, LA Works identified the University of New Mexico (UNM) as one of the mandatory education partners of its youth collaborative and included a copy of the MOU signed by the UNM Director of Special Programs. Because this MOU based youth collaborative arrangement is part of the consistently applied procurement procedures of LADCSS, there was never any requirement for LA Works to conduct any additional procurement process to select UNM as the provider for its College Works program. Thus, the awards to UNM constitute allowable sole source awards under 29 CFR 97.36(d)(4)(i)(C).

However, LA Works chose to help LADCSS address the concerns raised by EDD and initiated actions to determine whether or not there were any institutions of higher education within the State of California that might be interested and capable of running the same or a similar program at their location. Even though its May 1998 attempts at soliciting interest from fifty (50) California universities and colleges resulted in responses from only four which decided they were either unable or not interested in operating such a program, LA Works sent a Request for Interest (RFI) letter to more than two-hundred (200) institutions in October 2004. The RFI letter describes the existing program as a two-week college studies pilot with a focus on academics, college entrance and financial aid opportunities, career exploration workshops, health classes, motivation, leadership, self-esteem building and interpersonal skills development, in addition to enrichment activities such as field trips to museums and actual work experience assignments. The letter goes on to indicate that the Workforce Investment Board of Los Angeles County is seeking to identify a California college or university to operate a program with a similar design that provides as many services to students as possible. Only two inquiries were received in response to the RFI. One described the nature of its existing program and implied that it would be unable to run a program similar to that desired by LA Works. The other failed to follow through with a proposal after its initial contact.

In October of 2008, LA Works initiated a full competitive procurement Request for Proposals (RFP) process for its summer 2009 College Works program. The solicitation was announced in the Los Angeles Times and also distributed to nearly one-hundred (100) accredited colleges in California, Arizona and New Mexico. The RFP document thoroughly described all of the elements required for the program and indicated the value for proposal rating purposes for each of the six proposal sections. LA Works received e-mail inquiries from two institutions and a letter from a third which indicated that it could not provide such a program. However, only UNM actually submitted a proposal. Because only one proposal was received, it is by definition categorized as a noncompetitive proposal under 29 CFR 97.36(d)(4)(i)(D). LA Works completed a cost analysis required by 29 CFR 97.36(d)(4)(ii) and 97.36(f)(1), comparing the proposed total cost for this residential program with only the costs of meals and lodging for a like period. The comparison did not add the costs of the many included program elements. Yet the total award amount proposed by UNM was still less than the costs of meals and lodging only.

In summary, there is no WIA or federal administrative requirement that mandates a need for a full competitive procurement by LAWorks for its College Works program provided that said program is awarded to and operated by a mandated partner organization which signs an MOU as part of the LA Works Youth Collaborative. Both the State EDD procurement Directive Number: WIAD00-2 and the Los Angeles County Directive for the procurement of goods and services Number: D-DWA-00-037, SND-009, YTH-02-01 provide guidance which conform with the federal requirements. When LA Works conducted its 2004 RFI process and its 2008 full and open competitive RFP procurement process, it did so consistent with the federal, state, county and its own procurement policies and procedures.

A handwritten signature in cursive script, appearing to read "Edward J. Donahue, Jr.", written in black ink. The signature is fluid and stylized, with a large, sweeping initial "E" and a long, horizontal flourish extending to the right.

Edward J. Donahue, Jr.

John G. Chamberlin
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July 5, 2011

**OPINION LETTER ADDRESSING FINDING 11 OF THE MAY 22, 2008 LADCSS
MONITORING REPORT COVERING LA WORKS' COLLEGE WORKS PROGRAM**

This opinion letter addresses Finding 11 in the above referenced EDD monitoring report. I have reviewed all correspondence concerning this finding and have held follow up discussions with LA Works staff, and subject matter experts Ed Donahue and Ed DeJesus. It is my considered opinion that all costs charged to WIA to support the College Works Program from PY 2004 to date were reasonable, necessary, allocable and allowable.

Ed Donahue has concluded that the College Works Program was properly procured. Mr. Donahue's expert opinion was based on a thorough, independent review of the entire procurement record for the College Works Program from PY 2004 to date.

Ed DeJesus, the leading national expert on youth workforce programs, conducted an independent in depth review of the programmatic content, design and results achieved by the College Works Program, including interviews with staff and participants. Mr. DeJesus concluded that the College Works Program is not only an allowable WIA youth activity but is truly exemplary and worthy of wide spread replication.

The performance results achieved by the College Works Program were excellent. The program consistently exceeded WIA standards.

None of the individual line item expenses incurred in conducting the College Works Program has ever been questioned. It is important to note, however, that all participant airfare for travel to and from the university host site, the University of New Mexico, has been covered by non-WIA funds during the years in question.

The UNM-based residential portion of the College Works Program delivered the following activities:

- * Academic instruction in reading, math and English language skills, including remediation;
- * High School credits which count toward graduation units needed

- * SAT test preparation- High school exit exam preparation(CHASEE), and Community College Entrance Exam prep
- * Mentoring and individual tutoring;
- * 18 hours of life skills training including career exploration;
- * College entrance counseling;
- * Financial aid counseling;
- * Leadership and team building exercises;
- * Three separate cultural field trips;
- * Health education;
- * Time management and study skills;
- * Motivational speakers;
- * Work experience exploration;
- * A graduation ceremony broadcast via television to participant families back in Los Angeles;
- * Medical insurance;
- * Three nutritious meals each day;
- * Dormitory accommodations; and,
- * 24 hour supervision.

It is also important to note that the total cost charged per participant by the University of New Mexico for the above activities (\$117 per day per participant) is less than the lodging and standard "per diem" meal cost alone (\$99 for lodging per day and \$64 per day for meals at that time= \$163) at a moderate, local California hotel such as the Ramada Inn.

The total cost per participant paid to UNM for the residential portion of the College Works Program, as outlined above, was \$1,300-\$1,350 an increase of only \$50 from PY 2004 through 2008 and \$1521 in PY 2009. The total cost for the entire program, including an additional year of activities delivered by LA Works in Los Angeles County, was less than \$8500 per participant. This is less than the average "per participant" contract cost for Los Angeles County's overall WIA youth program for the program years in question. These are extraordinarily reasonable expenditure totals considering the results achieved by the College Works Program from PY 2004 to date.

The College Works Program targeted at risk, economically disadvantaged, WIA eligible youth in their junior year of high school at high schools with dropout rates approaching 50%. The vast majority of the youth served were minority youth from families in which no one had ever attended college. The likelihood of these youth attending college absent the College Works Program was extremely low. Program results show that 99% of the program participants succeeded in completing high school and 78% gained college entrance and attended college ... an extraordinary achievement and an amazingly successful investment of WIA youth funding. The high success rate is directly related to the program design, as detailed in Mr. DeJesus' report.

The College Works program was competitively procured by LADCSS. The design was described in each LA Works proposal submitted to the County and program results

always exceeded the negotiated contract requirements. Line item costs were included each contract budget and line item expenditures have been audited without any costs being questioned. There is no basis for concluding that there is anything wrong with the College Works Program's design, execution or expenditures. The mere fact that College Works (the initial two week portion of the year-round College Bound Program) takes place in New Mexico ... a design element which Mr. DeJesus deems critically important and directly related to the program's success ... does not form a basis for questioning cost reasonableness. There is no WIA bar on interstate travel.

In conclusion, I find that all College Works Program costs incurred from Program Year 2004 to date are reasonable relative to market rates and necessary to achieve valid program goals.

Please contact me at any time with any questions or further requests for information.

Sincerely,

John Chamberlin

The Equality of Opportunity:

A Review of the College Works Program

By Edward DeJesus

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The Equality of Opportunity: A Review of the College Works Program

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The Equality of Opportunity: A Review of the College Works Program

Introduction

"At first I wasn't all that sure. I knew I wanted to go to college, but I wasn't sure if I could. I didn't really think I could make it. But then the experience going from California to another state showed me I can deal with the independence thing, and then seeing all these different ethnicities going places; like -- wow, I can make it, I can do it. It just showed me a whole different perspective of things, and I was just amazed."

- College Works participant

For millions of youth from low income families achieving a post-secondary degree is commonly seen as a way out of poverty and a way to lay a foundation for a life of future economic opportunity. At-risk youth who complete post-secondary programs have higher earnings, more secure jobs, better benefits, and a greater life expectancy than their peers who did not complete high school or attend college.

Unfortunately, for thousands of at-risk low income youth, gaining access to postsecondary educational opportunities has been difficult. While many of these students dream of going to college, very few do – and even fewer complete. It is estimated that 7% of youth in the lowest income category attain a bachelor's degree by age 24 compared to 54% from the highest income group.

There are several variables that contribute to such low college participation and completion percentages. Some critics argue that the lack of academic preparation leaves many young people unable to compete in rigorous academic environments, while others cite lack of financial resources as the culprit. It has also been suggested that a lack of effort by post-secondary educational institutions to effectively reach out to and engage low-income students is a contributing factor. According to some researchers, structural and cultural constraints in the educational system add to the equation because they impede access for low income minority students.

While there is no one answer that explains the low college enrollment and completion rates, one thing is for certain - equal opportunity as it pertains to college access does not exist for low income students. LA Works' College Works program was developed as a means to bridge the opportunity gap for low income, at-risk youth and to help them gain access to and succeed in post-secondary education.

Promoting Equality of Opportunity

For years, a number of educational institutions have launched pre-college awareness programs to increase access to and retention in higher education for low-income students. The question of whether these programs are the solution to the problems of college access remains largely unanswered. Research has shown limited success from traditional pre-college programs, and few systematic efforts have been made to identify the key elements of programs that are successful. Part of the problem stems from programs focusing too narrowly on the issues of college enrollment and financial aid without due attention to providing low income youth the necessary experience required to be socially and psychologically prepared to enter and complete college.

"People see college, university, stuff like that, as a way to escape from where they're from, they want to get away. Some people want to stay close to home and everything; but other people want to see what it's like if I was away, like they want to get the feeling of who can I be if I'm further away from everything. Then when they come back, then they'll see if they feel comfortable or if they feel right being at home, or going away. Like, it would probably be somewhat the same if it was here in California, but just not the same as going to New Mexico."

- College Works Participant

This report provides a review of the College Works program. It examines whether College Works meets the standards of effective "Pre-College" program practice, describes the program's content and context, and it details how College Works takes the extra step toward addressing social and psychological issues that often hinder low income students from realizing full educational opportunity.

Review Methodology

The first step of the review process used to develop this report was an extensive literature review of college prep program evaluations and reports. The goal of this research was to identify common elements of effective program practice and operation. A broader review of youth development research was also conducted to identify the barriers to students' post-secondary achievement and effective strategies to address those barriers in policy and practice.

A site visit was made to LA Works, where the program is administered and where year-round services to youth are delivered as part of the larger Workforce Investment Act (WIA) In-school Youth Program, College Bound, of which College Works is the initial service component.

Second, interviews were conducted with the agency director and key administrative staff. This conversation explored the philosophy and mission of the program, elicited specific information about program elements, supportive services and management, and examined how the program fared in its contracted goals and WIA program expectations.

Third, staff members were interviewed to gain their perspective on the program and its effectiveness. These interviews explored more fully the various facets of the program to determine what elements of the program contributed to youth success and outcomes, empowered participants to strive for educational attainment, and seemed to truly improve the lives of youth.

Finally, participant interviews were conducted to get a sense of whether their expectations, experiences and outcomes matched the observations of staff and administrators. Moreover, we sought to uncover what key program elements led to their success and positive outlook for education in their future.

Program Content and Context

College Works is a component of College Bound, an intensive one-year career development program for low income youth, which is funded by the Los Angeles County WIA program. College Works is operated by LA Works in conjunction with the University of New Mexico. It was designed to promote educational opportunities for economically disadvantaged, at-risk, low achieving high school students. The program offers a two-week residential college experience at the University of New Mexico during the summer, providing students with access to a real life college experience, introduction to college courses, daily tutoring assistance, academic remediation, study skills training, preparation for college placement exams, and academic and college advising. Students participate in various group activities, creating educationally-focused peer groups that allow them to develop a mature sense of self, as well as bond with students with similar educational experiences. Students are also engaged in work experience assignments to gain valuable knowledge about the rigors and requirements of the world of work and exposure to various areas of academic discipline.

College Works is not summer camp. It is a key component of College Bound, an intensive one-year, WIA-funded career development effort where students are held to high standards of academic progress and performance, appropriate behavior, and goals for personal development. Students have the opportunity to improve their academic readiness, gain valuable work experience, and work closely with mentors to help them achieve educational and workforce goals.

Does College Works Demonstrate Effective Practices?

College Works demonstrates many of the elements of effective practices identified in research and youth development literature, including those concerning WIA-funded youth projects. Absent these core elements, many pre-college prep programs only superficially address the developmental needs of low-income youth. Consequently, the long-term academic and personal gains by these programs are minimal, resulting in unfavorable reviews and decreased public support.

A review of youth development literature points to the importance of the following core elements:

Prepare Students Academically

Multiple studies have concluded that access to a college preparatory curriculum while in high school is the most critical variable for helping students gain access to postsecondary education. Effective college prep programs help to prepare students academically through academic counseling, enrichment, and remediation; teaching study skills, and creating personalized learning environments and tutoring. Moreover, it is important for college prep programs to emphasize achievement in math and science courses, as this is a very important predictor of successful college completion. College Works demonstrates this practice by providing College Works students classroom instruction geared toward strengthening study skills specifically in math and English. Furthermore, College Works participants receive a total of forty (40) hours of tutoring and study skills training during the two-week residential program. Students are eligible to receive up to five high school credits when they have successfully completed both their classroom and work experience hours.

In addition, College Works participants participate in academic classes geared toward increasing reading and math skills through remediation. This concentrated study is designed to assist students in their preparation to pass the California High School Exit Exam (CHSEE), or alternative high school completion including General Education Diploma (GED) or California High School Proficiency Exam (CHSPE); and score well on their college placement exam (SAT).

College Works provides participating students with an intensive SAT preparation course preparing them academically to score to their maximum potential on the SAT. Students will have the opportunity to become academically prepared, and be equally qualified to enter higher learning institutions as other students whose background has gained them access to a richer education.

Balance Academic Support with Social Support

"I wanted to go to college. I saw my parents struggle. My parents don't have degrees, so I'm basically the first child to go to college out of the whole family on both my mom's and my dad's side. "

- College Works Participant

Research has shown that social support is a predictor of college attendance and completion. Social support helps students see college as a realistic option. Students are more likely to plan to attend college if their friends also plan to enroll. Strong social networks help support students' academic and emotional development, which can influence their likelihood of enrolling in college. In addition to peer support, research has shown that mentors play a key supportive role in helping low-income students overcome obstacles and enroll in college.

One of the ways in which College Works demonstrates this practice is through the extended service provided under the College Bound program. College Bound provides critical assistance, including encouragement and academic assistance to students throughout the academic year. Most importantly, for students who may not have access to an adult who has been through the college application process, the College Bound program provides guidance on how to prepare for and apply to college.

The College Bound mentor also serves as a vital link to resources, of which students and their families may otherwise be unaware, including information regarding the availability of financial aid and how to apply for it, and the different types of post-secondary educational programs students can pursue.

The College Bound program provides assistance to students in several other ways. It is widely known that the educational experiences of minority youth are tied to the educational experiences of minority adults. If the majority of adults in their community are without educational information, there is little hope that students will gain access to this information unless it is offered through the school system. The matter is further compounded by the fact that in many urban schools, counselors are unable to cultivate students' college awareness because of the time spent dealing with disciplinary issues, and due to lack of counseling resources. If low income students do not receive adequate and appropriate guidance, their likelihood of dropping out or not pursuing post-secondary education rises sharply.

Many students and their families may not be informed about which courses should be taken, or the timetable to accomplish these credits in order to be qualified and on track for college or university admissions. The College Bound program objectives help to ensure that students maintain a schedule of challenging courses that are appropriate and preparatory post-secondary choices. For many low-income students and their families, College Works is the main source of information about college. College Works builds trust through personal relationships

with parents, bridging the information gap and helping to empower parents as advocates for their students.

Through intensive case management for participants, the program as a whole makes a commitment to help all students realize their educational aspirations for the duration of their high school career and beyond. The College Bound case manager provides encouragement and preparation through weekly and monthly events. Students are offered weekly tutoring to assist them with any additional academic needs they may have. The Job Club is made available to participants to provide those students who need employment the assistance they need to hone job search techniques and resume writing. Students have the opportunity to see the benefits of going to college; recognizing the fact that continued education brings increased and better quality job opportunities as an adult. The College Bound program strives to prepare and assist participants for post-secondary education and training.

Involve and Encourage Parents/Family

Students with parents who are knowledgeable about college are more likely to attend college. Effective outreach programs address this predictor by involving parents and other family members, providing college information to parents, and teaching parents how to support their children's education.

Meaningful family involvement in college preparation goes beyond attendance at end of the year celebrations. College Works has developed a wide range of formal and informal activities for the families to participate in to promote the education of their children.

Parental support is important in the College Works program. College Works recognizes that it is important for students to receive college encouragement and assistance from other members of an "extended" family network. In many cases, economic status leaves parents of low income families under the assumption that college is beyond their means financially and for their children academically. This assumption makes it more likely that they will remain in the dark and unaware of college application, preparation and acceptance processes. Another factor that thwarts many parents from becoming more knowledgeable about the process is the fear of the temptations that their child may face when leaving home and living away from supportive environments. Unsure and wary about their child's ability for independent living, many parents frown on the notion of attending college.

College Works addresses these concerns by providing parents with the necessary information to allay their fears and concerns about the program and about their child making the transition from high school to college. During an orientation held by College Works staff, parents receive information regarding the nature of the program and review its major goals with the program coordinator. Short- and long-term objectives are discussed so that parents may be fully informed of how the program will benefit their child. Parents are informed about how they can

support program goals, such as helping their child with homework, or simply by discussing college or future careers.

Program mentors are responsible for maintaining close contact with parents to constantly discuss and monitor what they hope to accomplish together. College Works staff is responsible for monitoring student progress and keeping in contact with parents on a regular basis.

Help Students Navigate the College Admissions Process

"College Works explained a lot of things that I didn't actually know about college. It taught me things like, how to register, when to register, where to go to ask questions, stuff like that, about the on campus living to get away from parents or not to get away from parents. I learned all about that stuff. And then also the independent part, which allowed me to go somewhere else for two weeks, really taught me what I needed to know in terms of, when I was going to college, did I want to live with my parents or not."

- College Works Participant

Research has shown that helping students understand the college application process and preparing them for entrance exams are important predictors of success. Effective programs help students navigate the college admissions process.

College Works participants are evaluated through the College Development Plan (CDP); a companion plan to the WIA-mandated Individual Service Strategy (ISS). Students' strengths and weaknesses are addressed appropriately so that students are learning and retaining important material that will appear on standardized tests throughout high school and for college entrance exams. Additionally, participants are assessed to determine their basic skills levels in math and English, as well as their interests and abilities. The CDP then strategizes individual high school graduation and post-secondary educational plans. The CDP monitors crucial information regarding college application submissions, financial aid, deadlines, and fee waiver grants for college choices and disseminates this information to their participants.

College Works and College Bound provide participants with a series of post-secondary educational preparation services. Students receive valuable information regarding College and University admissions procedures and guidelines, scholarship and financial aid information and alternative post-secondary educational opportunities.

Provide Comprehensive, Long-Term Support

Research reveals that programs that have the greatest impact tend to be those that are comprehensive in terms of the services. Several evaluations have shown that students benefit more the longer they participate in the program. College Bound offers a wide variety of services and support for students for one year. College Works participants transition into the College Bound Program upon returning from their two week pre-college experience at the University of New Mexico. College Bound offers students a program that is designed to provide the

necessary tools and resources to promote high school graduation and entrance into higher learning institutions. The College Bound program provides critical assistance, including encouragement and academic assistance to students throughout the academic year.

Provide Financial Assistance

College Works recognizes that students need adequate financial resources in order to attend and complete college. Studies indicate that students who receive financial aid persevere in college better than or as well as students who do not receive aid. Programs that provide financial assistance by sending students on college visits, covering the fees for college entrance exams and applications, and awarding scholarships tend to demonstrate better results.

College Works staff work extensively with students to identify sources of financial aid. In addition, the cost of SAT Preparation is offered for each student. The cost of college is often beyond the reach of most families enrolled in the College Works program. Recognizing this fact, the College Works/College Bound program provides up to \$200.00 to each student to offset college application costs.

In addition, College Works participants may be allotted up to \$200 for supportive services. SAT preparation courses, testing fees and college applications are not included in the supportive service allotment. Supportive services include those which enable participation in the program such as transportation, childcare, clothing, text books, or similar items.

Alignment with WIA Youth Program Requirements

In addition to demonstrating all features of a successful college prep program, College Works combines all ten elements of WIA youth programs to deliver a robust and effective educational and employment preparation experience for participants. The fact that youth receive 131 hours of WIA-allowable academic support, career development work experience, counseling, mentoring and leadership development services during their participation in the College Works program highlight the fact that it is one of the nation's most innovative and intensive WIA programs for in-school youth.

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|---------------------------------------|
| Evidence of Effective Practice |
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Based on a review of the College Works program, it appears to demonstrate the 6 elements that the research suggests are important to promote college access and educational awareness in low income youth:

1. Working with the student to meet academic challenges.
2. Assisting students in navigating the unequal world of college admissions.

3. Providing social support to meet the challenges of accessing and preparing for post-secondary education.
4. Engaging parents in the process of college application and success.
5. Providing comprehensive, long-term support.
6. Providing financial assistance.

It's evident that College Works is an extremely promising program that should be expanded and replicated through WIA and other appropriate fund sources.

Beyond Effectiveness

College Works recognizes that low-income youth operate in a space where race, economic status, and social factors greatly impact their economic life chances. While College Works provides a range of services including, but not limited to, academic support, mentoring, leadership development, work experience, college planning, financial aid information, and opportunities for parental involvement, much of what limits the future economic opportunity of low-income youth happens outside the program. The importance of the above listed services cannot be disputed. However, a myopic focus on these service elements oversimplifies the college attendance process.

College Works recognizes this discrepancy and makes an attempt to address it in its initial program design. Research has shown that factors such as having a sibling in college, a parent who is a college graduate and access to multiple college experiences are also main contributors to higher educational aspirations for low income youth. While these seem sensible, very little programmatic efforts in this research have focused on the efficacy of such an approach.

While providing college access for parents, ensuring that siblings attend and complete college and allowing multiple pre-college experiences for program participants may not be feasible for WIA youth programs, it is a normal occurrence for their more affluent peers. In order to truly equalize opportunities for the educational advancement of low-income youth, programs must become more astute in the policies and practices that are rarely provided in pre-college or workforce development experience.

The Extra Step

Employers as well as colleges identify the need for students to possess effective self-management and "intelligent self-direction" for academic and workforce success. Stories abound of students failing in the educational arena or workplace due to lack of these abilities.

Educational apathy, bullying, attrition, school violence, absenteeism, substance abuse, lack of motivation, and psycho-social problems do not only occur during high school. The prominence of these issues goes largely unaddressed in college prep programs; often with disastrous results. While academic ability and financial aid preparation has much to do with college completion, the College Works program and its partner agencies recognize that this is clearly not the only approach.

For the purposes of this review, we asked ourselves what elements of the College Works program meet this objective. While all of the aforementioned elements contribute to student development, perhaps the most overlooked and undervalued element contributing to increased student self-direction and educational aspirations is the out-of-state educational experience. For example, what advantages accrue from the program's commitment to this practice? Similarly, what is gained from exposing youth who have limited opportunities for such experiences? Are such activities irrelevant or do they in fact increase the educational aspirations and opportunities of low-income youth?

It is the opinion of this author that it does. Incorporation of activities and services that increase young people's worldview exposure and opportunities for independent self-management can greatly improve the impact of college, and the workforce prep system and the future economic opportunity of low-income youth and must not be overlooked.

College Works is one of the first programs in the nation to begin the process of developing self-management opportunities through experiential, high quality learning experiences for young people, the majority of whom have few options to travel beyond the streets of the community in which they live.

By doing more than providing basic program services, College Works has introduced young adults to another world often unexplored by low-income youth - a world of independent living and educational preparation. While many workforce and foster care programs try to replicate the independent living experience in a classroom setting, it is clearly not enough. College Works gives young people an opportunity to remove themselves from their environment and discover the mental resolve and focus needed for lives of independent living and purpose.

"Some people want to stay close to home and everything; but other people want to see what it's like if I was away, like they want to get the feeling of who can I be if I'm further away from everything. Then when they come back, then they'll see if they feel comfortable, or if they feel right being at home, or going away. I could only get that by going away from California."

- College Works Participant

The investment in providing students with unique experiential activities has led to competencies rarely measured in college prep and workforce development programs.

Broadened Horizons

College Works participants spoke of the obstacles of participating in educational and college prep programs in the community where they live. Although localized services may allow them the comfort of staying in touch with their friends and loved ones, it does little in broadening their horizons. In fact, students were concerned about the negative impact that localized programs offer. For at-risk youth, peer influence is extremely important. Many of their peers didn't see the value of going to college or pursuing developmental opportunities. Research indicates that responsible peer groups can help youth develop a mature sense of self. For many of the College Works students, their peers did not possess this sense of maturity. For them, college was not a feasible investment. Former College Works participants appreciated the ability to develop new peer groups through the college experience, many of which they still have to this day.

College Works students talked about the excitement of seeing new things and meeting people who they may have never met if they stayed in one location their whole life. Many of the students appreciated this extension to their worldview. The College Works experience at the University of New Mexico afforded students the opportunity to break away from parental bonds and peer groups, and enabled the young to develop an independent identity. They appreciated being exposed to experiences and opportunities outside of a particular region.

"It was just like an opening to new horizons. It wasn't just California, where you live, you've got to get to other experiences because when you get a job, it's not like jobs are only in California. If you have to move for a better promotion, you have to take it, take that chance."

- College Works Participant

Enabling Personal Growth and Maturity

College Works students experienced enormous independence and personal growth after participating in the program. When they leave their comfort zone, they experience an awakening of who they are and what they can accomplish. It was a step toward adulthood and independent living that most workforce programs strive to emulate. Students who never have the experience of living away from home are unprepared for lives of independent living – the main goal of workforce development. Is it a required skill of adulthood that cannot be taught in a classroom? The experience provided the opportunity to acquire domestic skills and compelled them to learn problem solving strategies when they could not rely on their parents or the program.

"It showed us that we can make our own decisions. Being around our family, there was your mommy and daddy to hold your hand – 'oh, sweetie, you want this or this?' It was just us there, like saying -- oh, should I get this or should I get that, or should I do this -- and then you just think about it yourself. I want this and I want this, and I know I want it, and I'm going to do it. So, it gave us the opportunity to see that we're our own people. We can make our own decisions; we can make our own lives without mom and dad there. "

- College Works Participant

Increasing Awareness of Greater Job and Educational Opportunities

The more willing students are to seek educational opportunities outside of their immediate community, the more likelihood that these opportunities will become present. The same holds true for job seekers. Unfortunately "mobility for opportunity" is not a class taught in workforce development programs.

According to the U.S. Department of Education, in 2006, three-fourths of 4-year college freshmen who had graduated from high school in the previous 12 months attended an in-state college, and one-fourth attended an out-of-state college. In the State of California, less than 12.6 percent of graduating high school students attends public or private 4-year educational institutions. This number is significantly lower for low income and minority students.

Without the ability to learn about travel, the skills needed to make it while on their own, and the realization that not everything will be provided for them, low income students are often unprepared for the demands of academic success. Moreover, without access to information, influences and experiences that can expand their worldview, legitimization of participation in the world of work and the educational system that supports it is compromised.

Conclusion

This analysis has significant implications for students enrolled in workforce development programs, because services are not often focused on development maturity and sense of self. That is, students in WIA programs may achieve more academically and economically if they are engaged in activities that encourage intelligent self-direction and maturity.

With the current emphasis of pre-college programs on effective practices, there needs to be an increased emphasis, and more balanced perspective, on the development of social and emotional learning essential to academic and career success – something that experiential learning opportunities afford. In the case of College Works, they have begun the process, and the investment, that can promote equality of opportunity of low income youth.

College success is about more than SAT preparation and financial aid assistance. It's about more than outcome measures and ten elements of WIA youth programming. It's about investing in opportunities that will enrich young peoples' worldview and sense of self. This report suggests an increased investment in programs like College Works, which offer an exploration of the factors that enhanced students' educational opportunities and worldview; assisting youth in making the transition to economic mobility.